## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

BISOUS BISOUS LLC,

Plaintiff.

v.

Case No. 3:21-CV-01614-B

THE CLE GROUP, LLC, BISOU UPTOWN MANAGER, LLC, and BISOU LP HOLDINGS, LLC,

Defendants.

### RESPONSE TO ORDER TO SHOW CAUSE AND JOINT STATUS REPORT

In response to the Court's Order (Dkt. 98), Bisous Bisous LLC ("Plaintiff") and The Cle Group, LLC, Bisou Uptown Manager, LLC, and Bisou LP Holdings, LLC (together, "Defendants") provide the following status update of their settlement negotiations:

- 1. As communicated to the Court previously, Plaintiff and Defendants reached a settlement in principle after participating in mediation with Suzanne Butler, Circuit Mediator for the United States Court of Appeals for the Fifth Circuit, on December 3, 2021, and additional settlement discussions thereafter.
- 2. On February 25, 2022, the parties executed a settlement agreement that disposes of all claims and defenses asserted by all parties in this action.
- 3. The parties will file a joint motion to dismiss stipulating to the dismissal of all claims and counterclaims with prejudice no later than March 2, 2022.

We appreciate the Court's patience with the parties during this process.

Date: February 28, 2022 Respectfully submitted,

#### FISH & RICHARDSON P.C.

# BUETHER JOE & COUNSELORS, LLC

By: /s/ David B. Conrad

David B. Conrad

Texas Bar No. 24049042

conrad@fr.com

1717 Main Street, Suite 5000

Dallas, TX 75201

Telephone: (214) 747-5070 Facsimile: (214) 747-2091

Kristen McCallion (Admitted PHV)

mccallion@fr.com

Vivian Cheng (Admitted PHV)

cheng@fr.com

7 Times Square, 20th Floor

New York, NY 10036

Telephone: (212) 765-5070 Facsimile: (212) 258-2291

By: /s/ Kenneth P. Kula

Eric W. Buether

State Bar No. 03316880

Eric.Buether@BJCIPLaw.com

Christopher M. Joe

State Bar No. 00787770

Chris.Joe@BJCIPLaw.com

Kenneth P. Kula

State Bar No. 24004749

Ken.Kula@BJCIPLaw.com

1700 Pacific Avenue

Suite 4750

Dallas, Texas 75201

Telephone: (214) 730-5660 Facsimile: (972) 707-1248

### ATTORNEYS FOR PLAINTIFF

## CHRISTIAN LEVINE LAW GROUP, LLC

Ardalan Attar State Bar No. 24113538 aattar@christianlevinelaw.com

2302 Fannin Street

Suite 500

Houston, Texas 77002

Telephone: (713) 659-7617

### ATTORNEYS FOR DEFENDANTS

Case 3:21-cv-01614-B Document 100 Filed 02/28/22 Page 3 of 3 PageID 1462

**CERTIFICATE OF SERVICE** 

The undersigned hereby certifies that on February 28, 2022, a true and correct copy of the

foregoing document has been filed with the clerk of court for the U.S. District Court, Northern

District of Texas and served on all counsel of record who are deemed to have consented to

electronic service via the Court's CM/ECF system.

Dated: February 28, 2022

/s/ David B. Conrad
David B. Conrad

3